

# Holland & Knight

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## ELECTRONIC FILING

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March 1, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445-12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

RE: **EB Docket No. 06-36**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2012**  
**Global Reach Communications, Inc.**

Dear Ms. Dortch:

Transmitted herewith, on behalf of Global Reach Communications, Inc., is its 2012 CPNI Certification and Accompanying Statement for filing in the above-referenced docket.

In the even there are any questions in connection with this filing, please communicate with the undersigned.

Very truly yours,

  
Peter M. Connolly

Enclosures

cc: Best Copy and Printing, Inc. via electronic mail

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**Annual 47 C.F.R. § 2009(e) CPNI Certification**

**EB Docket 06-36**

Annual § 64.2009(e) Certification for 2012

Date filed: February 28, 2013

Name of company covered by this certification: Global Reach Communications, Inc.

Form 499 Filer ID: Pending

Name of signatory: Graham Milne

Title of signatory: President

I, Graham Milne, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with this Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

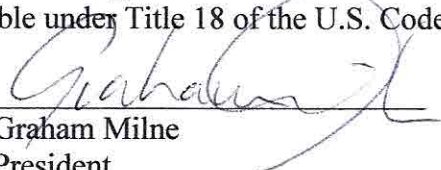
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e. proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

  
Graham Milne

President

Global Reach Communications, Inc.

## **Global Reach Communications, Inc. policy for the protection and handling of Customer Proprietary Network Information (CPNI)**

### **1. Safeguarding CPNI**

Global Reach Communications, Inc. (GRC) recognizes the importance and legal obligation of safeguarding CPNI information.

- 1.1 All service is sold through our web portal and is offered as a non-rechargeable service.
- 1.2 Customers complete an order form to purchase service, which includes only billing information
- 1.3 Billing information is stored in a secure environment
- 1.4 All customer communication is carried out through email only
- 1.5 We validate a customer by the email address from which they correspond, and only reply to the email address recorded at the point of sale
- 1.6 If we are unable to reach them at the email address given at purchase, we will call the customer on the phone number registered at purchase
- 1.7 The service is not account based and thus customers have no access to their individual customer proprietary network information necessitating password and other protections. Customers purchase a certain number of minutes of use, use those minutes, and then make a new purchase

### **2. Acceptable Use of CPNI**

- 2.1. GRC restricts its use of CPNI for the purposes of:
  - a. Providing customers with account support information such as rate change information.
  - b. Providing customers with offers and promotional information specific to their current GRC service offering.
- 2.2. All customers are provided with an opt-out notification in a form and manner appropriate with FCC regulations governing CPNI (section 64.2001 – 64.2009)
- 2.3. GRC maintains a complete record for a minimum of one year of all marketing campaigns for which CPNI is used.
- 2.4. GRC maintains a complete record for a minimum of one year of all disclosures or provisions of CPNI to any third party.
- 2.5. All use of CPNI, whether internal or external, must receive supervisory review and approval from a GRC Vice President or higher. A record of such reviews is maintained for a period of at least one year.

### **3. Customer Subscription Options (Opt-in and Opt-out)**

- 3.1. GRC provides a click through link on every email sent that allows a customer to opt-out of any subscription.

- 3.2. GRC maintains a record of all changes to a customer's subscriptions for a period of at least one year. Such records included the date and time of the change and the method of the change (online or through customer service).

#### **4. Employee Training and Disciplinary Procedures**

- 4.1. GRC ensures that all employees who have access to CPNI are trained on the procedures laid out in this policy document.
- 4.2. GRC will issue a written warning to any employee who breaches these procedures. If an employee breaches these policies a second time, their employment with GRC will be terminated.

#### **5. Actions in the Case of a Breach in CPNI Procedures**

- 5.1. In the case of breach of these CPNI procedures, GRC will firstly act to protect against continued breach.
- 5.2. GRC will notify law enforcement of any breach as soon as possible but not later than seven business days following the breach.
- 5.3. Unless otherwise directed by the relevant investigating agency, GRC will not notify customers or any other party of the breach until seven business days have elapsed following the notification to law enforcement.
- 5.4. Records of all breaches will be maintained by GRC for a minimum of two years.